Comment Area: Groundwater

Tritium Sampling & Analysis Plan (TSAP)

No groundwater sampling was originally included or required for HRS.

Ongoing Laboratory Program(s)

- An extensive groundwater monitoring program has been in place since 1991. Under the Resource Conservation and Recovery Act (RCRA) Corrective Action Program, the Laboratory identifies soil and groundwater contamination that may have resulted from past releases of contaminants to the environment. This is accomplished by an extensive system of wells which in general monitors for four categories of contaminants: volatile organic compounds (VOCs), hydrocarbons, metals, and tritium. Activities are closely coordinated with regulatory agencies which review and comment on submitted work plans, quarterly progress reports, and other required documents.

- Information is reported annually in the Laboratory's site environmental reports and is available at the UC Berkeley Main library, Doe Library, second floor, or via the website at http://www.lbl.gov/ehs/epg/html/env_protection.htm.

Task Force and Community Comments

1. Perform groundwater monitoring as suggested by the Regional Water Quality Control Board (RWQCB). Use as a pathway for the EPA HRS. (6/1, p. 7, 2 and 11; 6/1, p. 13, 4; 6/1, p. 89, 12 ff.; 6/1, p. 91, 3; 6/1, p. 108, 13 ff.; 4/25, p. 56, 14; 4/25, p. 57, 10 ff.)

2. The RWQCB is specifically concerned that tritium impacts to groundwater be included as part of EPA's Hazard Ranking System evaluation of risks to human health and the environment. For quality assurance and technically defensible results, a complete evaluation of all tritium exposure pathways from known and potential sources through all media including groundwater to existing and potential receptors must be performed using existing and new data to be collected as part of this tritium sampling plan. (RWQCB letter to the Lab, 5-1-2000).

3. Add groundwater sampling in coordination with the RWQCB. (Franke/IFEU Report).

4. Groundwater is not a significant pathway because groundwater within 4 miles of the site is not currently being used for drinking water, and no drinking water wells within 4 miles of the site have been closed due to site-related contamination. (U.S. EPA letter to City of Berkeley, 8-9-00).